

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re</p> <p>AKORN HOLDING COMPANY LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 7</p> <p>Case No. 23-10253 (KBO)</p> <p>(Jointly Administered)</p>
<p>GEORGE L. MILLER, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>VERTEX, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Proc. No. 25- 50359 (KBO)</p>

PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (the “Civil Rules”), made applicable to the above-captioned adversary proceeding (the “Adversary Proceeding”) by Rule 7055 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Plaintiff George L. Miller, in his capacity as chapter 7 trustee of the bankruptcy estates for the above-captioned debtors, by and through his undersigned counsel, hereby requests that a default be entered against the above-captioned defendant (the “Defendant”) in the above-captioned adversary proceeding (the “Adversary Proceeding”) based on the details set forth in the Declaration of Evan T. Miller

¹ The Debtors in these Chapter 7 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Akorn Holding Company LLC (9190); Akorn Intermediate Company LLC (6123) and Akorn Operating Company LLC (6184). The Debtors’ headquarters was located at 5605 CenterPoint Court, Gurnee, Illinois 60031.

in Support of Plaintiff's Request for Entry of Default (the "Miller Declaration") attached hereto as **Exhibit A**. A form of Entry of Default is attached hereto as **Exhibit B**.

Dated: August 26, 2025

SAUL EWING LLP

/s/ Evan T. Miller

Evan T. Miller (DE Bar No. 5364)
Paige N. Topper (DE Bar No. 6470)
1201 N. Market Street, Suite 2300
Wilmington, DE 19801
Telephone: (302) 421-6800
evan.miller@saul.com
paige.topper@saul.com

and

Michelle G. Novick (admitted pro hac vice)
161 North Clark Street, Suite 4200
Chicago, IL 60601
Telephone: (312) 876-7899
michelle.novick@saul.com

and

Turner N. Falk (admitted pro hac vice)
1500 Market Street, 38th Floor
Philadelphia, PA 19102
Telephone: (215) 972-8415
turner.falk@saul.com

Counsel to Plaintiff